

COPY

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

ELIJAH RODRIGUEZ, an infant under the age of
Eighteen, by his father and natural guardian,
ARISTEDES RODRIGUEZ, and ARISTEDES
RODRIGUEZ, Individually

Plaintiffs,

v.

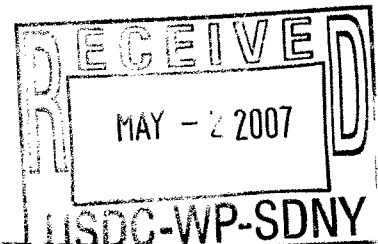
ROYAL CONSUMER INFORMATION
PRODUCTS, INC.,

Defendant.

07 CIV. 3505

Civil Action No.

JUDGE KAPLAN



NOTICE OF REMOVAL

TO THE HONORABLE CHIEF JUDGE AND JUDGES OF THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Defendant, Royal Consumer Information Products, Inc. (Hereinafter "ROYAL"), hereby
files this Notice of Removal of this action from the Supreme Court of New York, Bronx County,
to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C.
§1441 and, in support thereof, avers as follows:

1. As appears from the docket, files and records of the Bronx County Clerk's Office,
the above-captioned action was commenced by the filing of a complaint on or about February
13, 2007.
2. On April 3, 2007, plaintiffs served Defendant ROYAL CONSUMER
INFORMATION PRODUCTS, INC., (hereinafter "ROYAL"), with copies of the Summons and
Complaint through CT Corporation System (*True and correct copies of the Summons and
Complaint are attached as Exhibit "A"*).

3. Issue was joined by defendant ROYAL by service of its Answer on May 2, 2007, annexed hereto as *Exhibit "B."*

4. No further proceedings have been had in the Supreme Court of New York, Bronx County, in connection with the above-captioned action.

5. This is a civil action alleging injuries resulting from cross cut paper shredder accident involving plaintiff infant, Elijah Rodriguez. The Complaint sets forth claims of negligence in ROYAL's design, manufacture, construction, assembly, and sale and servicing of the product against ROYAL.

6. As alleged in the Complaint, Plaintiffs are residents of the State of New York (*See Plaintiffs' Complaint at ¶ 1*).

7. Defendant ROYAL is a corporation organized and existing under the laws of Delaware, and is a domestic corporation of Delaware. ROYAL's principal place of business is in Somerset, New Jersey. (*See Certificate of Incorporation for "Royal Consumer Information Products, Inc." and Certificate of Good Standing, annexed hereto as Exhibit "C"*).

8. The amount in controversy, excluding costs and disbursements, exceeds the jurisdictional limit of this Court of \$75,000.00. (*Plaintiff's Response to Request for Supplemental Demand for Relief pursuant to CPLR § 3017(c) annexed hereto as Exhibit "D"*).

9. This Court has original jurisdiction of the above-entitled action, pursuant to 28 U.S.C. §1332, and the action may therefore be removed to this Court pursuant to 28 U.S.C. §1441(b).

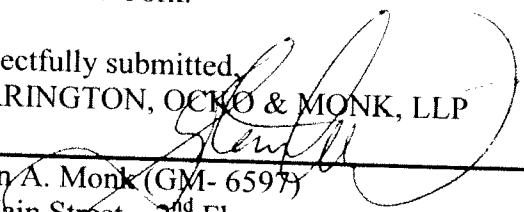
10. This Notice of Removal is filed within thirty (30) days of the receipt of the Summons and Complaint in this action served upon Defendant ROYAL.

11. A true and correct copy of this Notice of Removal will be filed with the Clerk of the Supreme Court of New York, Bronx County, as provided by U.S.C. §1446.

12. Written notice of the filing of this Notice of Removal will be served upon Plaintiff, through their counsel of record.

WHEREFORE, Defendant, Royal Consumer Information Products, Inc., prays for removal of the above-captioned action from the Supreme Court of New York, Bronx County, to the United States District Court for the Southern District of New York.

Respectfully submitted,
HARRINGTON, OCHO & MONK, LLP



Glenn A. Monk (GM- 6597)
81 Main Street – 2nd Floor
White Plains, New York 10601
(914) 686-4800

*Attorneys for Defendant
Royal Consumer Information Products, Inc.*